

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

In re Ethicon Inc. Pelvic Repair System  
Products Liability Litigation

MDL No. 2327

THIS DOCUMENT RELATES TO ALL CASES

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**APPLICATION FOR APPOINTMENT OF LISA BLUE  
TO SERVE ON PLAINTIFFS' STEERING COMMITTEE**

NOW INTO COURT comes Lisa Blue who respectfully files this application for appointment to the Plaintiffs' Steering Committee ("PSC").

I am a trial lawyer and licensed psychologist. Since 1985, I have focused on product liability and toxic tort law. I am a founder of the Baron & Blue Law Firm in Dallas, Texas. My office is currently investigating several hundred claims involving personal injuries suffered as a result of implanted transvaginal surgical mesh products. I am applying time, experience, resources, and insights to effectively and compassionately represent women in the pelvic and mesh litigation.

I have three decades of experience in civil litigation with significant experience in complex product liability litigation and trials. I have conducted over 100 trials. I have been involved in substantial verdicts, settlements, and awards for victims of dangerous products. I was honored to be named one of the top 50 women litigators in the U.S. by The National Law Journal (2001).

I desire to bring my unique experience and compassion to this case. I work well and cooperatively with other lawyers. I have worked with proposed lead counsel and many of the lawyers proposed for plaintiff leadership. I have reviewed the Proposed Counsel Structure Plan

filed with the court for MDLs 2325, 2326 and 2327 on March 19, 2012 and join in the recommendation to the court that the plan be accepted. I trust my inclusion in the plaintiff leadership will materially add to the abilities, dimension and scope of the plaintiff leadership. I am fully committed to the task of expeditiously moving this matter through discovery, toward trial, and/or to resolution.

Dated: Dallas, Texas

March 20, 2012

Respectfully Submitted,

By : \_\_\_/s/ Lisa Blue

LISA BLUE

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Alex Wolf

Alex Wolf